

# CONTOS & BUNCH

LAWYERS

August 29, 1983

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REPLY TO: Woodland Hills

John G. Peterson, Esq.  
TRABISH & PETERSON  
4676 Admiralty Way, Ste. 902  
Marina del Rey CA 90291

Re: Church of Scientology of California vs.  
Gerald Armstrong; Case No. C420 153

Dear Mr. Peterson:

On August 19, 1983, I met with you and Michael Magnuson regarding your client's response to our First Request for Production of Documents.

With respect to Request Nos. 1, 2, 14, 15 and 16, you decided to stand on your client's objections and would not agree to produce the documents requested therein.

With respect to Request Nos. 3-4, you agreed to provide any written communication between your client and Omar Garrison and others regarding the biography project.

With respect to Request No. 5(a), you stated a search would be made for the original Petition of Mr. Armstrong to L. Ron Hubbard, and produce it if it could be found. If it could not be found, you agreed to make a written response indicating what steps were taken to locate the original Petition.

With respect to Request No. 5(b), you agreed to follow the same procedure as outlined for Request No. 5(a) in attempting to locate the letter from Pat Brice.

With respect to Request No. 6, you agreed to provide the original agreement of October 30, 1980, if it was possible to obtain.

With respect to Request No. 7, you agreed to search for all communications during 1982 from the DK Publications Organization, and would make available any documentation that was not privileged.

With respect to Request No. 9, you agreed to provide a "pre-printer work copy" of the suppressive person declare on Mr. Armstrong.



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With respect to Request No. 10, you stated you would check to see what Flag Conditions Order No. 6439 was and would get back to me.

With respect to Request No. 11, you agreed to search for a time track and proposal prepared by Vaughn Young dealing with the biography, and would review them for relevancy. Once you had reviewed them, you agreed to get back to me with a response.

With respect to Request No. 12, you indicated a likelihood that Mr. Armstrong's personnel, ethics and B-1 files would be produced pending authorization of your client. You also requested that should your client agree to production, Mr. Armstrong would be required to provide a release. You would not agree to turn over pre-clear and auditing files of Mr. Armstrong.

Following our discussion, it was agreed that you would provide me with a written response or with production of documents by August 26, 1983. That date has come and gone and I have heard nothing from you.

I request that you advise me as to the status of the production of these documents because it has been quite some time since we first requested their production.

In addition, I again request that you send me the declaration you filed in connection with the Order to Show Cause re Contempt on Michael Flynn.

Thank you for your anticipated courtesy and cooperation.

Very truly yours,

CONTOS & BUNCH

JULIA DRAGOJEVIC

JD:pr

cc: Howard Stechel, Esq.  
Michael Magnuson, Esq.  
Gerry Armstrong